

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

IN RE	:	CHAPTER 13
	:	
JOSEPH W. SAMUELS	:	CASE NO: 18-17277JKF
	:	
	:	
Debtor	:	
	:	
	:	
	:	

**DEBTORS' RESPONSE TO THE MOTION
REQUESTING RELIEF FROM THE AUTOMATIC STAY**

The Debtor, through counsel, responds to the Motion of Santander Consumer USA Inc., (“Movant”), for relief from the automatic stay as to Debtor’s vehicle, a 2010 Nissan Pathfinder bearing vehicle identification number 5N1AR1NB3AC607676 (the “Property”) as follows:

1. Debtor concedes there are postpetition arrears.
2. There is no cause for relief from the automatic stay. Movant concedes that there is over \$5,000 of equity in the vehicle.
3. Debtor will be filing a motion to modify the confirmed plan and pay the balance of Movant’s claim in full.
4. Debtor’s plan payments are being made via wage deduction so there is little likelihood of future defaults.

WHEREFORE the Debtor requests that the Motion be DENIED.

/s/ Alfonso Madrid
ALFONSO MADRID, ESQ.
Attorney for Debtor/Objector
757 South 8th St.
Philadelphia PA 19147
(215)925-1002
(215)689-4809 (fax)
Alfonsomadrid.esq@gmail.com